

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
RODNEY HINES	:	VIOLATIONS:
JULIO PEREZ	:	18 U.S.C. § 371 (conspiracy to
LEIA WATERS	:	commit an offense against the
	:	United States - 1 count)
	:	18 U.S.C. § 472 (possessing and
	:	distributing counterfeit currency -
	:	1 count)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Bank of America was a financial institution insured by the Federal Deposit Insurance Corporation ("FDIC") certificate number 3510.
2. Defendant LEIA Waters worked at Bank of America (BOA) as a teller.
3. From on or about October 1, 2006 through October 30, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**RODNEY HINES
JULIO PEREZ
LEIA WATERS**

conspired and agreed, together and with other known and unknown to the grand jury, to commit

an offense against the United States, that is, to possess and pass counterfeit Federal Reserve Notes, in violation of Title 18, United States Code, Section 472.

MANNER AND MEANS

3. It was part of the conspiracy that defendant JULIO PEREZ converted approximately \$2,000 in counterfeit United States Currency into genuine currency through defendants RODNEY HINES and LEIA WATERS.

It was further part of the conspiracy that:

4. Defendant JULIO PEREZ provided the counterfeit currency to defendant RODNEY HINES who, in turn, gave the counterfeit currency to defendant LEIA WATERS at Bank of America.

5. For her part in the crime, defendant LEIA WATERS was paid approximately \$300.

6. Defendant LEIA WATERS removed approximately \$2000 in Federal Reserve Notes from her teller drawer at Bank of America and replaced the legitimate currency with the approximate \$2000 in counterfeit currency which she received from defendant RODNEY HINES.

OVERT ACTS

_____ In furtherance of the conspiracy, defendants JULIO PEREZ, RODNEY HINES and LEIA HINES, and others known and unknown to the grand jury, committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. On or about October 10, 2006, defendant JULIO PEREZ gave \$2000 in counterfeit currency to defendant RODNEY HINES.

2. On or about October 25, 2006, defendant RODNEY HINES gave defendant LEIA WATERS \$300 as compensation for exchanging the counterfeit currency for \$2000 in genuine currency taken from her teller drawer at Bank of America.

3. On or about October 25, 2006, defendant LEIA WATERS exchanged the counterfeit \$2000 for genuine currency and gave the genuine currency to defendant RODNEY HINES.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 25, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendants

**RODNEY HINES
JULIO PEREZ
LEIA WATERS**

with intent to defraud, possessed, concealed, passed and attempted to pass, falsely made, forged
and counterfeited obligations of the United States, that is, approximately \$2000 in counterfeit
Federal Reserve Notes.

In violation of Title 18, United States Code, Sections 472 and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violation of Title 18, United States Code, Section 472 set forth in this indictment, defendant

**RODNEY HINES
JULIO PEREZ
LEIA WATERS**

shall forfeit to the United States of America any and all property involved in such offense, and any property traceable to such property, including, but not limited to, the sum of \$2000.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982.

A TRUE BILL:

GRAND JURY FOREPERSON

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**